



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

September 9, 2023

**BY ECF**

The Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Roman Storm*, 23 Cr. 430 (KPF)**

Dear Judge Failla:

The Government respectfully requests, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, that the Court enter the enclosed proposed protective order to govern discovery in this matter, for the reasons set forth in the proposed order. Counsel for the above-referenced defendant has consented to this proposed order, which has been executed by the parties.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: /s/ Thane Rehn  
Thane Rehn  
Assistant United States Attorney  
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cc: Defense counsel (via ECF)